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Before the Federal Communications Commission Washington, DC 20554

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In the matter of

Policies and Rules Concerning
Children's Television Programming
Revision of Programming Policies
For Television Broadcast Stations

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MM Docket No. 93-48

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FOR Television Broadcast Stations

#### **COMMENTS OF**

## THE CENTER FOR RESEARCH ON THE EFFECTS OF TELEVISION

Cornell University & Ithaca College Ithaca, NY 14850 (607) 274-3110

prepared by

Dr. John Condry NG 25 MVR Cornell University Ithaca, NY 14853 607-255-0841 Dr. Cynthia Scheibe Dept. of Psychology Ithaca College Ithaca, NY 14850 607-274-1324

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## THE CENTER FOR RESEARCH ON THE EFFECTS OF TELEVISION

The Center for Research on the Effects of Television (CRETV) is a joint project between Cornell University and Ithaca College under the direction of Dr. John Condry and Dr. Cynthia Scheibe. It was begun in 1983 under the name of Human Development & Television Research (HDTV), and was renamed CRETV in 1992.

CRETV has two components: an Archive of television content, and a Research Lab conducting studies of the content of television and its effects on viewers. The Archive consists of representative samples of television that are videotaped and analyzed for program and commercial content. The samples were taken every two years from 1983 through 1991, and have been taken yearly since then. During each year sampled, two composite weeks of television are selected from each of four months of the year, and on each day the content is videotaped from 7 a.m. until 1 a.m. the following morning. The three major networks (ABC, NBC, CBS) are monitored through their affiliates in Syracuse, NY, and additional samples are drawn from Fox, PBS,

Nickelodean, and two independent stations from New York City. The Archive currently contains more than 3700 hours of television content, including more than 5800 programs and over 100,000 commercials.

The Archive is used extensively by the CRETV researchers themselves and is also available as a resource for others. Analyses of the content of the Archive are used to document the nature of television (its structure, the content of programs and commercials) and to trace changes that occur over time. This information can then be used to study the psychology of television: its effects on different types of viewers, how viewers understand and respond to the content they see, and the role that television plays in psychological development across the lifespan.

<u>Iohn Condry</u> is Professor of Human Development & Family Studies at Cornell University. He has been studying the content and effects of television since the early 1970s and has frequently been consulted by federal and private organizations concerning the effects of television on children. He teaches courses on social development, motivation, and the psychology of television, and is the author of <u>The Psychology of Television</u> (1989, Lawrence Erlbaum, Associates). He is also jointly appointed as a faculty member in Communications at Cornell.

Cynthia Scheibe has been an Assistant Professor of Psychology at Ithaca since 1986. She began studying the content of television in 1976 as an undergraduate, and continued as a graduate student in Communications at Cornell University (M.S. '83). While working on her doctorate in Developmental Psychology at Cornell (Ph.D. '87), she and Dr. Condry established the CRETV Research Lab & Archive. She currently teaches courses in child psychology, lifespan development, and the psychology of television.

#### I. EDUCATIONAL TELEVISION

What must a television program contain for it to be considered "educational?" The term "education" presupposes the broader term "learning," and specifically learning as accomplished by human beings.

Learning has long been a central topic of psychology, both in its broader meaning (including the animal kingdom at large) and in the more restricted meaning of a human being's acquisition of knowledge and skills. Limiting ourselves to the human case, learning may be said to encompass at least four central factors: <a href="strategies of learning">strategies of learning</a>, or learning activities; <a href="characteristics of the material to be learned">characteristics of the learner</a>, characteristics of <a href="the material to be learned">the learning process</a>. These factors merge interdependently to define the learning, and thus the educational, process.

To simply define educational material as that which "furthers children's positive development in any way, including serving their cognitive/intellectual or social/emotional needs," while broadly true, is too lacking in specificity to serve a useful purpose. Let us consider these four characteristics as they apply to the general notion of learning, and then apply them to the specific case of educational television programming.

- 1) Strategies of learning. Many years of developmental research have established that efficient learning is in large part dependent on the provision of different activities and methods of acquiring certain information. It is not possible to describe either learning, or the "educational" value of a task without taking into consideration the strategies available to a learner for accomplishing the task. Many of the strategies of learning are age-specific, bringing us to the second consideration.
- 2) <u>Characteristics of the learner</u>. Learners differ in what they understand of the world, what they can do, and how much they know about

their understanding and their own capacities. As with the factor of strategies, it is not possible to describe something as "educational" unless the characteristics of the person to be educated is taken into account. What may be educational for a five year old may be "old hat" and uninformative to a 7 year old, and what is of educational value to a 7 year old is boring and of no educational value to a 10 year old.

- 3) The material to be learned is the third important factor in efficient learning. Whether there is, for example, organization inherent in the material, and the type of organization it is, are central features of the learning, thus the "educational," process.
- 4) Goals of learning. Finally, virtually all real learning in natural contexts is goal directed. To claim of some material that it is "educational" requires the definition of the goal to be obtained.

Thus there is an intimate relationship between what is already known and what can be readily acquired, between the strategies available to the learner and the material offered for learning, and between all of these factors and the goal to be accomplished by an educational endeavor. It is not possible to adequately describe something---such as a television program---as "educational" without describing at least some, and preferably all, of these factors and how they are meant to function in this particular context.

Minimally, it is necessary to know just what in the program is educational, for whom in the audience, with what particular goal in mind.

It is certainly reasonable to allow broadcasters a wide degree of latitude in their programming decisions. Given the intentions of the CTA, however, it is <u>not</u> reasonable to allow such a vague definition of "educational" programming as to make the term meaningless and thus applicable to programs such as <u>The Flintstones</u> and <u>G.I. Joe</u>.

We see at least three problems with the current definition of "educational" programming. First, the inclusion of "social/emotional needs" is so vague that it allows a wide range of programs to fall under it, including most of the so-called "educational" cartoons that have been ridiculed in the press. Any program with a vague or general moral lesson, or any program dealing with a social issue, could be classified under this definition. It is extremely questionable, however, as to whether or not the audience is actually learning the intended moral lesson, especially when such a message may be very brief and/or countered with other unintended messages in the program. Furthermore, while it is possible to demonstrate whether or not children have actually "learned" new information presented in a program (e.g., scientific facts, vocabulary, letters of the alphabet), it would be very difficult to demonstrate such learning has occurred when the program presents a very general moral lesson, or "teaches self-esteem," as was claimed for the Super Mario Brothers cartoon.

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children. The purpose must be stated in advance, with the specific educational goal and target audience stated clearly by the broadcaster, so that it is possible for those seeking to determine if broadcasters are meeting their obligations to test this proposition. Target audience must be specified in terms of a specific age or meaningful range of ages for whom the material is intended to be educational, if the term is to have meaning (for all of the reasons stated above). Some educational programs, such as Sesame Street, now do this. They claim their material is relevant for 3-5 year old children, with both cognitive (specifically, letters, numbers, and simple concepts such as "tall" and "short") and social-emotional (non-racism, cooperation) goals. It is possible, with such a description, to look at the program and see if the concepts taught are potentially relevant to this particular target audience. Without such specificity, it is nearly impossible to determine if the intentions of Congress have been met.

Thus the <u>means</u>, the <u>ends</u>, and the <u>particular audience</u> in mind are necessary components of an adequate definition of educational programming. In the sections to follow we go into more detail about these three components of the educational process as it is applied to broadcasting television programs.

#### II. THE AUDIENCE

For a program to be called educational, the potential audience must be

We believe that in being age-specific, broadcasters could define the ages to be served as falling within three basic age ranges: Preschool (ages 3-6), Middle Childhood (ages 7-12), and adolescents (ages 13-16). Abundant research documents the fact that these three age ranges have different needs and cognitive capacities, they are attracted by different forms of television (cartoons for the youngest age range, situation comedies for the middle age range, and basically adult programming (soap operas and action/adverture programs) for the oldest age range). If broadcasters were to specify the appropriate age range of the target audience, not only would researchers be able to determine if the messages were getting through to children of this age range, but it would also be possible, at a glance, to determine what ages were not being served by broadcasters, thus to target these ignored ages in later programming.

#### III. THE MEANS

We believe that educational programming should mean standard-length programming, aired at a predictable time during which children are likely to awake and able to watch television, with a frequency sufficient to allow some choice of educational programming each day on every broadcasting outlet. We believe that television certainly does have the potential to serve the cognitive/intellectual and social/emotional needs of children as has been demonstrated for over twenty years by the Children's Television Workshop's program Sesame Street. This program teaches language skills (vocabulary and reading), basic and fundamental perceptual concepts (short and tall, near and far, etc.), and mathematical skills. The broad design of Sesame Street is, we believe, a good one and could be taken as prototypical for educational programs, since the goals of the program are researched in advance, with a specific target audience in mind, and then these

goals are translated into <u>programming goals</u> to be met with each program in a series.

We believe this broad design should be incorporated by broadcasters. The goals and audience of the program should be clearly stated, and it should be clear from watching how those goals are translated into elements of the program. The same is equally true of social/emotional goals. These should be stated in advance, described clearly, with a particular audience in mind. It is not sufficient to say that Leave it to Beaver provides moral lessons. It is critical that broadcasters specify what moral lessons are promoted to what age children. Like cognitive development, moral and social development occurs in stages over a long period of time. A simple moral lesson meaningful to a 5 year old may be less valuable to a 10 year old who is at a more advanced stage of moral reasoning. Furthermore, without a specific goal for such a moral lesson (what you want the child to come away with), such moral lessons may be too vague or unclear for a child to gain anything from them.

#### IV. THE ENDS

As we have indicated, it is not enough for programs that presume to be educational to have simply the means---that is the concepts and the organization---inherent in an educational endeavor; they must also have goals to be achieved with a specific target audience. We believe for programs to qualify as educational these goals must be specified by the programmer. Whether they be cognitive/intellectual goals or social/emotional goals, they must be spelled out in advance so that others, interested in compliance, can test children to see if these goals are being met. This concept is central to determining if broadcasters are complying and to allow researchers such as

television than social/emotional goals. Or, it may turn out that certain teaching techniques are more successful than others. We will not be able to test these claims if broadcasters are allowed to continue the practice of specifying vague claims without clarifying the target audience. If the claims are more precise however, then research can progress by analyzing the success of one format versus another for teaching certain concepts.

One of the difficulties with the current situation is that the goals are so vague that programmers are able to cite such diverse programs as <u>G.I. Joe</u> and <u>Leave it to Beaver</u> as "educational." By adopting a "goals oriented" approach, the Commission can provide a benchmark for weighing claims that a particular program serves the needs of children under the requirements of the Act. Without such standards, it will be virtually impossible for community activists, academic researchers or others to study the impact of the regualtion or to evaluate compliance by licensees.

By saying that programmers should specifiy the goals of a program this does not limit the broadcasters, but rather leaves open a wide variety of potential goals to be met, so long as they are specified in advance.

Psychological research has demonstrated important principles in children's understanding of educational messages, as our introduction specified. In devising policies in this area, the Commission can best serve the public interest by faming its approach to regulation in a manner that is consistent with these principles.

## V. SUMMARY AND IMPLICATIONS

Several implications can be drawn from the preceding review:

1) The commission should define educational and informational programming for children as specific content that serves children's cognitive/intellectual or social/emotional needs. If the claim is that it serves

the social/emotional needs of children, these should be specified clearly and unambiguously.

2) While the above definition is necessary, it is not sufficient because it
is too vague in practice. The goals of the program must be specified in
advance, and the manner in which elements of the program mets these goals
must also he specified. Most importantly, the target audience, falling in
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# Respectfully submitted,

THE CENTER FOR RESEARCH ON THE EFFECTS OF TELEVISION Cornell University and Ithaca College Ithaca, NY 14850 (607) 274-3110

## Prepared by:

Dr. John Condry NG 25 MVR Cornell University Ithaca, NY 14853 607-255-0841 and

Dr. Cynthia Scheibe Dept. of Psychology Ithaca College Ithaca, NY 14850 607-274-1324

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